

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ANGELO LOMBARDO,	:	
	:	
	Plaintiff,	
	:	CIVIL ACTION NO. 02-CV-2960
v.	:	
LOCKHEED MARTIN CORPORATION,	:	MOTION FOR ADMISSION
	:	<u>PRO HAC VICE</u>
	Defendant.	
	:	
	X	

Defendant, Lockheed Martin Corporation (hereinafter referred to as "Lockheed"), by and through its attorney, Christopher M. Farella, of the firm Epstein Becker & Green, P.C., hereby moves this Court for leave to allow Robert H. Bernstein, of the firm of Epstein Becker & Green, P.C., Two Gateway Center, 12th Floor, Newark, New Jersey 07102, to appear and participate in this case, and in support thereof, avers the following:

1. I am admitted to and am in good standing with the Bar of the United States District Court for the Eastern District of Pennsylvania, the Commonwealth of Pennsylvania, the State of New Jersey and the United States District Court for the District of New Jersey, and the State of New.
2. I hereby move to admit Robert H. Bernstein to practice before this Court pro hac vice in the above-entitled action.

NE:72361.1

3. Mr. Bernstein represents Lockheed in several matters and is intimately familiar with the subject matter of the pending action. Lockheed desires Mr. Bernstein to appear as counsel on its behalf in this case.

4. Mr. Bernstein is a member in good standing of the Bar of the State of New Jersey as well as the Bars of the United States District Court of Appeals for the Third Circuit and the United States District Court for the District of New Jersey.

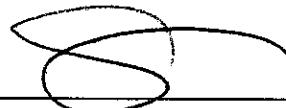
5. Plaintiff's counsel has consented to Mr. Bernstein's admission.

6. Mr. Bernstein is not now, nor has he ever been, the subject of disciplinary proceedings in any jurisdiction.

7. I am acquainted with Mr. Bernstein and I can attest to his diligence, ethical standards, and willingness to abide by the Local Disciplinary Rules of the United States District Court for the Eastern District of Pennsylvania. If admitted to practice before this Court pro hac vice, Mr. Bernstein will carry out his obligations ably and in accordance with the standards expected by this Court.

WHEREFORE, it is respectfully requested that this Court enter an order admitting Robert H. Bernstein pro hac vice on behalf of defendant, Lockheed Martin Corporation.

EPSTEIN BECKER & GREEN, P.C.
Attorneys for Defendant
Lockheed Martin Corporation

By: 

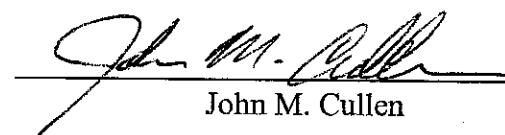
Sheila A. Woolson
Attorney I.D. No. 76898
Two Gateway Center, 12th Floor
Newark, New Jersey 07102
(973) 642-1900

Dated: July 10, 2002

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CERTIFICATION OF SERVICE

I hereby certify that on this day I caused the original and one copy of the foregoing Motion for Admission pro hac vice, Affidavit of Robert H. Bernstein, and proposed form of Order to be served upon the Clerk, United States District Court, Eastern District of Pennsylvania, at the U.S. Courthouse, 601 Market Street, Philadelphia, Pennsylvania 19106-1797; and upon plaintiff by mailing copies of same, via regular mail, postage prepaid to Steven A. Cotlar, Esq., Law Offices of Steven A. Cotlar, attorneys for plaintiff, at 23 West Court Street, Doylestown, PA 18901.



John M. Cullen

Dated: July 10, 2002

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